

Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510
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SECRETARY OF THE
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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant Name French & Company			
2. Address <input type="checkbox"/> Check if different than previously reported 601 Thirteenth Street, N.W., Suite 370 South			
3. Principal Place of Business (if different from line 2) Washington D.C. 20005 City: State/zip (or Country)			
4. Contact Name Verrick O. French	Telephone (202) 783-7272	E-mail (optional)	5. Senate ID # 15452-90
7. Client Name <input type="checkbox"/> Self J.C. Penney Company, Inc.			6. House ID # 30875007

TYPE OF REPORT 8. Year 2003 Midyear (January 1-June 30) OR Year End (July 1-December)

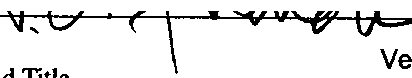
9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report ⇔ Termination Date _____

11. No Lobbying Activities

INCOME OR EXPENSES Complete Either Line 12 OR Line 13	
<p align="center">12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇔ \$ <u>40,000.00</u> Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇔ \$ _____ Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(1) Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e)(1) Internal Revenue Code</p>

Signature _____ Date _____



Printed Name and Title _____ Verrick O. French, President _____

Registrant Name French & Company Client Name J.C. Penney Company, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant is engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code TRD (one per page)

16. Specific lobbying issues

U.S./Vietnam bilateral textile negotiations and provisions of quotas

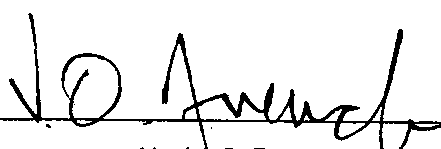
17. House(s) of Congress and Federal agencies contacted Check if None

House
Senate
Department of Commerce
United States Trade Representative

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Verrick O. French	President
Richard R. Gill	Executive Vice President
Rebecca Dornbusch	Vice President

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature  Date 8/14/03

Printed Name and Title vernex O. French, President

Form LD-2 (Rec. 4/03)

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Registrant Name French & Company Client Name J.C. Penney Company, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant is engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code RET (one per page)

16. Specific lobbying issues

HR 1000, HR 1776 and other proposals for pension reform

17. House(s) of Congress and Federal agencies contacted Check if None

House
Senate

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Verrick O. French	President
Richard R. Gill	Executive Vice President
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19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature  Date 8/14/03

Printed Name and Title VERICK A French, President

Form LD-2 (Rev. 4/03)

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